

EXHIBIT F

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Attorneys for Defendant PACIFIC GAS AND
ELECTRIC COMPANY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PACIFIC GAS AND ELECTRIC
COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**DECLARATION OF [REDACTED] IN
SUPPORT OF RESPONSE TO ORDER
REQUESTING INFORMATION ON
DIXIE AND BADER FIRES**

Judge: Hon. William Alsup

1 I, [REDACTED] hereby declare under penalty of perjury as follows:

2 1. I make this declaration based upon personal knowledge and if called as a witness I
3 could and would testify competently to the matters set forth herein.

4 2. I am a Director of Electric Dispatch and Scheduling with Pacific Gas and Electric
5 Company ("PG&E"). As a Director of Electric Dispatch and Scheduling, I am familiar with
6 records created and maintained by PG&E related to assignments, or tags, sent to workers in the
7 field, like roving operators and troublemen. I am also familiar with the manner in which PG&E
8 stores recorded calls on PG&E phone lines.

9 3. Attachment 1 to this declaration is a true and accurate copy of the Order Activity
10 Report for Tag 0009119619 (the "Cresta Dam tag"), created on July 13, 2021 at 9:36 a.m. An
11 Order Activity Report shows certain events in connection with a tag, such as creation, assignment,
12 reassignment, or completion of the event. According to the Order Activity Report, the Cresta
13 Dam tag was initially assigned to a Quincy service area troubleman and then reassigned to a Chico
14 service area troubleman ("Dixie Troubleman") at 10:47 a.m.

15 4. Attachment 2 to this declaration is a true and accurate copy of the Troubleman
16 Workload Report for the Chico troubleman who was assigned the Cresta Dam tag on July 13,
17 2021. A Troubleman Workload Report shows a troubleman's tags on a particular day, including
18 the times that: (a) the troubleman received the tag; (b) the troubleman began traveling to the
19 location associated with the tag; (c) the troubleman arrived at the location; and (d) the troubleman
20 completed the tag. A Troubleman Workload Report also shows other information associated with
21 the tags, including the job code and any remarks from the dispatcher or the office associated with
22 the tag. According to the Troubleman Workload Report, the Dixie Troubleman received the
23 Cresta Dam tag at 10:47 a.m. and that he was on site at Cresta Dam no later than around 12:30
24 p.m. According to the Troubleman Workload Report, the Dixie Troubleman received a different
25 priority 1 tag at 10:28 a.m. that he completed before heading to the Dam.

26 5. Attachment 3 to this declaration is a true and accurate copy of the Trouble Report
27 generated by PG&E's Outage Information System on July 14, 2021. A Trouble Report shows data
28 associated with outages reported by customers or generated by PG&E Smart Meters, including the

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1 time at which an outage report was received and the manner in which it was reported. According
2 to the Trouble Report for July 14, 2021, PG&E's system detected a partial power outage on the
3 Paradise 1105 Circuit on Bader Mine Road at 2:48 p.m. According to the report, at 3:14 p.m.,
4 Butte County called PG&E regarding a wire down.

5 6. Attachment 4 to this declaration is a true and accurate copy of the Outage Dispatch
6 Tool for the first troubleman who responded to the Bader Fire on July 14, 2021. An Outage
7 Dispatch Tool shows the date and time on which field workers, including troublemen, are assigned
8 tags, as well as the time that the field worker arrives at the location associated with the tag.
9 According to the Outage Dispatch Tool, the first troubleman was dispatched at 2:51 p.m. and
10 arrived at Fuse 1291 by 3:22 p.m.

11 7. I have listened to a recording of a phone call from Rock Creek Hydro Operator
12 [REDACTED] to Distribution Control Center Operator [REDACTED] on July 13, 2021, at 7:21
13 a.m. What follows is an excerpt of the call, which is approximately 43 seconds long.
14 Approximately seven seconds into the call, the Hydro Operator asks the Control Center Operator
15 whether he is aware of any work on the Bucks Creek 1101 Line because "it seems like we lost AC
16 power supply to our Cresta Dam." The Control Center responds, "No, I don't have anything going
17 on on Bucks Creek." The Hydro Operator responds, "Ok, I got a rover that's responding and I'll
18 let you know what I find out when he gets there."

19 8. I have listened to a recording of a phone call from Rock Creek Hydro Operator
20 [REDACTED] to Distribution Control Center Operator [REDACTED] on July 13, 2021, at 9:07 a.m. What follows
21 are excerpts of the call, which is approximately one minute and 57 seconds long. Approximately
22 four seconds into the call, the Hydro Operator reports: "There is trouble on the Bucks 1101. It
23 seems to be energized at the sub there by Bucks powerhouse, but somewhere from there down to
24 Cresta Dam in the, in the tunnel on Highway 70 must be where the trouble is because we do not
25 have station service at Cresta Dam and all the lights are out inside the Elephant Butte tunnel."
26 Approximately 43 seconds into the call, the Hydro Operator says, "it hasn't been windy here, you
27 know, so I don't know what could have caused it." He says the roving operator confirmed there
28 was power at the Bucks substation, "so from the sub to the Dam and the Tunnel there's some

1 trouble.” Approximately one minute and 33 seconds into the call, the Control Center Operator
2 asks, “Did your rover happen to look at the fuses there? Looks like we’ve got two sets of
3 fuses.” The Hydro Operator says, “He didn’t say if he looked at them or not.” The Control Center
4 responds, “Either way, I will get a troubleman heading that way.”

5 9. I have listened to a recording of a phone call from [REDACTED] the Quincy
6 troubleman who initially received the Cresta Dam tag to [REDACTED] in Dispatch, on July
7 13, 2021, at 9:42 a.m. What follows is an excerpt of the call, which is approximately 27 seconds
8 long. Approximately 10 seconds into the call, the Quincy troubleman informs Dispatch, “I got a
9 tag, but it’s actually a Chico t-man tag, or Paradise.” The dispatcher responds, “Alright, I’ll move
10 it.”

11 10. I have listened to a recording of a phone call from [REDACTED] the Chico
12 troubleman (“Dixie Troubleman”), to Distribution Control Center Operator [REDACTED] on July 13,
13 2021, at 11:25 a.m. What follows are excerpts of the call, which is approximately six minutes
14 long. Approximately two minutes and 55 seconds into the call, the Control Center Operator tells
15 the Dixie Troubleman about his earlier calls with the Rock Creek Hydro Operator at 7:21 a.m. and
16 9:07 a.m.: “Rock Creek called earlier and they were asking if we were having trouble on that
17 Bucks Creek 1101, and I told them no, not as far as I can tell, and so he sent his rover out there,
18 and they do in fact not have any station service. And he said that it’s something on our primary,
19 because the tunnel—I think right there at Cresta—he said is dark.” The Dixie Troubleman and the
20 Operator then discuss the need to check fuses 805 and 17733, and that the latter is difficult to
21 access, well up the mountain on a difficult road. Approximately five minutes and 19 seconds into
22 the call, the Operator concludes that “because the breaker’s closed, it still has a good load, I don’t
23 have any other indication of trouble, I would say it’s probably one of those two fuses.”

24 11. I have listened to a recording of a phone call from the Dixie Troubleman to
25 Apprentice Distribution Control Center Operator [REDACTED] on July 13, 2021, at 2:59 p.m. What
26 follows are excerpts of the call, which is approximately two minutes and 25 seconds long.
27 Approximately 28 seconds into the call, the Dixie Troubleman reports that he checked the 805
28 fuses. Then: “I looked up the hill, there’s a fuse blown, I can tell at least one fuse blown at, what

1 is it, 17733. So I drive around, which takes about an hour and a half / two hours, and I get about a
2 mile from the pole, and Butte County is working on a bridge and I can't get to our pole." He then
3 reports that in his conversation with the crew, which occurred about an hour before the call, the
4 crew said they would be done "in about two hours." Approximately one minutes and 48 seconds
5 into the call, the Operator advises him go back up there when the crew was done on the bridge and
6 "then we'll try to fix that fuse."

7
8 I declare under penalty of perjury that the foregoing is true and correct to the best of my
9 knowledge.

10 Executed this 20 day of July, 2021, in the City of Lemoore, County of
11 Kings, State of California. 